

June 27, 2017



Comments regarding CG Docket No. 17-59

Call Control, a spinout of the Kedlin Company has been blocking unwanted nuisance calls since the introduction of its first products in 2007. The company's patent-awarded technology combines community-based reputation, behavioral analytics and user personalization to address the broad scope of nuisance calling.

The most recent Federal Trade Commission reports show robocall complaints continue unabated at near record levels. Addressing this problem in-network with service providers, new standards and clarifications on regulations will greatly empower the industry to stop nuisance calling.

We endeavor help consumers and industry by contributing to these proceedings.

Commentary by section:

**Section II-B—4.** The Commission has made it abundantly clear that nothing in the TCPA prohibits service providers from offering blocking tools when the consumer requests them. Yet, many providers have been reluctant to provide such tools, or only offer same to a limited set of subscribers based on level of service, or delivery platform. It is our belief that this is unacceptable and service providers should not be allowed to limit the availability of solutions to nuisance, harassment and threats for consumers.

**Section II-E-9.** This section discusses "Call Completion Considerations." In another way to view this model, a call will now be **presented** to the subscriber who, if so enabled, can accept, refuse, voicemail, automated message etc. any incoming request for connection. In this way, the service provider may handle bulk rejection of incomplete/missing CallerIDs, and allow subscribers to control who may actually reach them.

Furthermore, not allowing call blocking to be available to a provider's entire subscriber base harms disadvantaged consumers.

**Section III A- 15.** This section discusses providers sharing subscriber requests to block calling parties. We believe this is the *wrong* approach as any individual subscriber will only opt-in to their service provider and only grant them consent. There is a subscriber-centric approach wherein each service provider's subscribers will produce enough blocking requests to produce the desired result. We receive get millions of such reports each month. We also believe intercarrier data sharing of subscriber generated information will damage **consumer privacy** and add **unnecessary** bureaucracy.

For further clarification, sharing information about bulk blocking of calls (invalid #, unassigned etc) is desirable; however, subscriber requests are between the subscriber and service provider.

**Section III-C-25.** Subscriber Consent. Subscribers to apps, hosted software, content providers, etc. are required to opt-in everyday by the millions. Any individual subscriber may **personalize** their blocking list which may include harassment, bullying, family conflicts etc. The personalization may be extended to an allow list of family members, doctors and friends. These should be consider highly privacy protected for each subscriber.

**Section III-C-26.** As suggested here previously change the definition of 'Call Completion' to include calls **presented** but not accepted by the subscriber.

**Section IV-27.** Community-based reputation scoring uses highly sophisticated behavioral algorithms to identify 'presumptively illegal' calls. Algorithms are 100% objective in that no bias is placed in the decision-making except for subscriber scoring. The specific implementation is constantly improved over time.

**Section IV-28.** As discussed before, **bulk** blocking of presumptively illegal calls based on known incomplete or failure in the originating number etc. is encouraged.

**Section IV-A-29.** We believe industry should be evaluating, testing and innovating new techniques to prevent illegal calls to subscribers. Refined techniques exist and these can be integrated into service providers' networks now.

**Section IV-A-33.** The growing industry-wide experience and capability does not require carriers to share this information as it will be commercially available. The Commission will not be required to encourage and facilitate this share as it will come from end-users into each carrier network. The Commission role, this manner, will be reporting abuse (IRS...) and sharing that other information (FTC) with industry technology providers.

**Section IV-C-37.** We are testing a method to ensure that opt-in 'allow list' callers are not blocked in our systems. For example, local counties emergency warning systems, Sheriff's, school closings etc. To be clear, the method works and will be implemented at scale.

**Section IV-C-37.** A remediation process for enterprises and consumers is required to prevent unwanted call blocking and to reinitiate new numbers. For example, if a TCPA violator number ends up with a consumer, how can the service provider or consumer efficiently unlock the number?